

**BWG****BIPHENYL WORK GROUP**

1850 M. Street, N.W., Suite 700

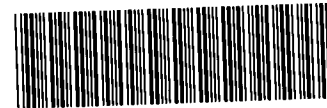
Washington, D.C. 20036

(202) 721-4162 - (202) 296-8120fax

August 6, 1999

Charles M. Auer, Director  
 Chemical Control Division (7405)  
 Office of Pesticides and Toxic Substances  
 Environmental Protection Agency  
 Room E513C  
 401 M Street, S.W.  
 Washington, D.C. 20460

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Re: ECA Proposal for HAPs Testing of Biphenyl

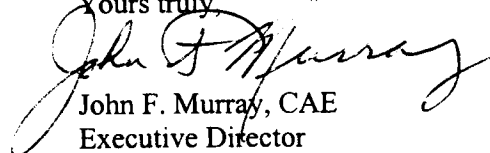
Dear Mr. Auer:

The Biphenyl Work Group (BWG) appreciates the careful review you and your staff gave to our October 7, 1997 proposed test program for biphenyl. That program, developed with the assistance of Dr. Melvin E. Andersen, called for a 90-day inhalation study, pharmacokinetic studies, and development of a physiologically-based pharmacokinetic (PBPK) model. BWG remains committed to developing a program that makes maximal use of existing animal data through PBPK modeling. Such an approach not only eliminates unnecessary costs, but also responds to animal welfare concerns by limiting the need for additional *in vivo* testing.

The BWG and Dr. Andersen have carefully reviewed EPA's comments. We understand the need to supplement our prior filing with additional testing elements in some areas; but, in other areas, substantial scientific questions raised by your comments cause us to want to sit down with your staff to explore thoroughly exactly what EPA seeks and the best means of achieving that aim. These questions need to be answered before we can determine whether it would be useful to develop, and, if so, the scope of, any further ECA proposal.

We therefore request a meeting with you and your staff to clarify the Agency's position. We would bring Dr. Andersen to such a meeting. Please ask Rich Leukroth to call me with possible meeting dates as soon as possible.

Yours truly,

  
 John F. Murray, CAE  
 Executive Director

cc: Richard W. Leukroth, Jr.  
 HAPs Project Manager (7405)  
 OPTS Docket 42187A &B (7407)  
 BWG Group  
 Dr. Andersen  
 L. Mark Wine  
 Counsel to BWG

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